

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 19-cv-10750-NGE

vs.

Hon. Nancy G. Edmunds

DAMIAN JACKSON, HOLLY  
JACKSON; STREAMLINE  
PROPERTY SOLUTIONS, LLC;  
MACOMB COUNTY, MICHIGAN;  
and STATE OF MICHIGAN

Defendants.

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**DEFENDANTS DAMIAN JACKSON, HOLLY JACKSON; STREAMLINE  
PROPERTY SOLUTIONS, LLC ANSWER TO PLAINTIFF'S FIRST  
AMENDED AND SUPPLEMENTED COMPLAINT**

Now comes Defendants Damian Jackson, Holly Jackson; and Streamline Property Solutions, LLC and in answer to Plaintiff's First Amended and Supplemented Complaint state as follows:

1. Defendants admit.
2. Defendants admit.
3. Defendants admit.
4. Defendants admit.
5. Defendants admit.
6. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

7. Defendants neither admit nor deny but leaves the Plaintiff to its proof.
8. Defendants admit.
9. Defendants neither admit nor deny but leaves the Plaintiff to its proof.
10. Defendants neither admit nor deny but leaves the Plaintiff to its proof.
11. Defendants neither admit nor deny but leaves the Plaintiff to its proof.
12. Defendant Holly neither admit nor deny but leaves the Plaintiff to its proof.
13. Defendant Jackson neither admit nor deny but leaves the Plaintiff to its proof.
14. Defendants neither admit nor deny but leaves the Plaintiff to its proof.
15. Defendant Jackson neither admit nor deny but leaves the Plaintiff to its proof.
16. Defendant Holly neither admit nor deny but leaves the Plaintiff to its proof.
17. Defendant Holly neither admit nor deny but leaves the Plaintiff to its proof.
18. Defendant Jackson neither admit nor deny but leaves the Plaintiff to its proof.
19. Defendant Jackson denies for the reason it is not true and for the reason that he pleaded guilty only to one count - 18 U.S.C. § 286.

20. Defendant Jackson denies for the reason that it is not true and for the reason that the agreement "only" applies to the restitution, not that which is in paragraph 13.

21. Defendants Holly denies for the reason it is not true.

22. Defendant Jackson denies for the reason that it is not true and for the reason that the agreement "only" applies to the restitution, not that which is in paragraph 13.

23. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

24. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

25. Defendants deny for the reason that the statute speaks for itself.

26. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

27. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

28. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

29. Defendants admit.

30. Defendants admit.

31. Defendants deny for the reason that the statute speaks for itself.

#### **COUNT ONE**

32. Defendants need not answer.

33. Defendants admit.

34. Defendants admit.

35. Defendants admit.

36. Defendants deny the conveyance of the Wendy Property to Streamline Property Solutions, LLC, was made with the actual intent to hinder, delay, or defraud the United States of America for the reason it is not true. Defendants deny the remainder of the Paragraph for the reason that the statute speaks for itself.

37. Defendants admit.

38. Defendants deny for the reason that the court ordered a monthly payment amount of 250.00 per month at the time of the judgment.

39. Defendants deny for the reason that the statute speaks for itself.

40. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

#### **COUNT TWO**

41. Defendants need not answer.

42. Defendant Damian Jackson denied that he neglected, refused, or failed to pay the liabilities described in paragraphs 9 and 13, and 27, and after notice and demand, federal tax liens for the reason it is not true. Defendant Damian Jackson denies the remainder of the Paragraph for the reason that the statute speaks for itself.

43. Defendant Holly Jackson denied that she neglected, refused, or failed to pay the liabilities described in paragraphs 9 and 16, and 28, and after notice and demand, federal tax liens for the reason it is not true. Defendant Holly Jackson denies the remainder of the Paragraph for the reason that the statute speaks for itself.

44. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

45. Defendants deny for the reason that the statute speaks for itself.

46. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

47. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

48. Defendants deny for the reason that the statute speaks for itself.

49. Defendants agrees that lien enforcement by the plaintiff is proper but proposes other collection alternatives.

### **COUNT THREE**

50. Defendants need not answer.

51. Defendants deny the assertions been made for the reason that the statute speaks for itself

### **COUNT FOUR**

52. Defendants need not answer.

53. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

54. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

55. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

56. Defendants neither admits nor deny but leaves the plaintiff to its proof.

### **COUNT FIVE**

57. Defendants need not answer.

58. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

59. Defendants neither admit nor deny but leaves the Plaintiff to its proof.

WHEREFORE, Defendants respectfully request that this court deny any suggestion of a sale of our primary home, as that would cause further severe hardship, Defendants request that this court order another collection alternative and

lastly, Defendants request that this case be dismissed with cost and attorney fees so wrongfully incurred.

Respectfully Submitted,

Dated : April 5, 2023

/s/Damian Jackson  
DAMIAN JACKSON  
and on behalf of Streamline Property Solutions,  
LLC

Dated : April 5, 2023

/s/Holly Jackson  
HOLLY JACKSON  
and on behalf of Streamline Property Solutions,  
LLC

**CERTIFICATE OF SERVICE**

I certify that service of the foregoing Defendants' Answer To Plaintiff's Amended And Supplemented Complaint has this 5<sup>th</sup> day of April 2023 been made via electronic notification through the Court's CM/ECF electronic filing system, to all parties who have entered an appearance in this action and are participating in the Court's CM/ECF electronic filing system.

/s/Damian Jackson  
DAMIAN JACKSON